

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to: All Actions

PLAINTIFFS' SECOND SET OF SUPPLEMENTAL INITIAL DISCLOSURES

Pursuant to the Court's Orders of April 12, 2011 and May 14, 2015 (ECF No. 2957), Plaintiffs in all actions in this MDL submit the following Second Set of Supplemental Initial Disclosures under Federal Rule of Civil Procedure 26(a)(1) to identify "the potential witnesses among those listed on their 26(a)(1) disclosures who[m] they have the present ability to depose either because the individual is cooperating with them or because that person is subject to service of process," and/or "whom they have a present intention either to depose or to secure a declaration from." See April 12, 2011 Discovery Hearing Transcript, p 13. Plaintiffs make these disclosures based on information currently available to them.¹ Plaintiffs reserve their right, under the Federal Rules of Civil Procedure, to further supplement these disclosures as additional information becomes known.

¹ Plaintiffs will continue to supplement this list in the event they secure the cooperation of additional testifying witnesses outside of the United States, or identify other witnesses who are subject to the subpoena power of the Court whom they intend to present as testifying witnesses, whether through deposition, affirmation, or otherwise.

I. INDIVIDUALS WITH KNOWLEDGE CONCERNING THE ACTIVITIES OF THE REMAINING DISCOVERY DEFENDANTS

Plaintiffs in these consolidated proceedings identify the following individuals as those who may have discoverable information concerning the terror sponsorship activities of the remaining discovery defendants, and whose testimony may presently be secured through subpoena, notice of deposition, or on a cooperative basis. Plaintiffs do not consent to or authorize any communication prohibited by any applicable rule of professional conduct.

A. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the Muslim World League (“MWL”), Abdullah Omar Naseef, Abdullah bin Saleh al Obaid, Abdullah Muhsen al Turki, and Adnan Basha. Individuals include, but are not limited to:

1. Dr. Abdullah bin Abdul Mohsen al Turki
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.
Subject: Dr. al Turki is the current Secretary General of the Muslim World League (“MWL”) and has held that position since 2000. In his capacity as Secretary-General, Dr. al Turki has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; (ii) the operations, policies, and activities of the purported charitable organizations that fall within the umbrella of the MWL, such as the International Islamic Relief Organization (“IIRO”); and (iii) the allegations, investigations, and facts concerning the MWL’s and IIRO’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Further, Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. al Turki’s authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities’ provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Turki has knowledge and information regarding the MWL’s relationship with, and employment of, Wa’el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).
2. Dr. Abdullah bin Saleh al Obaid
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Dr. al Obaid served as Secretary General of the MWL from approximately 1995-2000. In a 1997 interview published in the MWL's own newspaper, Dr. al Obaid himself acknowledged that charges of terrorism sponsorship had been leveled against the Saudi charities, including the MWL. Dr. al Obaid further served as the head of the MWL's branch office in the United States, located at 360 S. Washington Street, Suite 300, Falls Church, VA 22046. Accordingly, Dr. al Obaid has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; (ii) the operations, policies, and activities of the purported charitable organizations that fall within the umbrella of the MWL, such as the International Islamic Relief Organization ("IIRO"); and (iii) the allegations, investigations, and facts concerning the MWL's and IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding the MWL's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

3. Dr. Abdullah Omar Naseef

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Dr. Naseef served as Secretary General of the MWL from approximately 1983-1993. Accordingly, Dr. Naseef has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; (ii) the operations, policies, and activities of the purported charitable organizations that fall within the umbrella of the MWL, such as the International Islamic Relief Organization ("IIRO"); (iii) the allegations, investigations, and facts concerning the MWL's and IIRO's presence in Pakistan and Afghanistan during the Soviet-Afghan war and their activities in support of the mujahideen fighters; and (iv) the allegations, investigations, and facts concerning the MWL's and IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding the MWL's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

4. Prince Talal bin Abdulaziz al Saud

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Prince Talal served as a member of the Board of Directors of Rabita Trust, a subsidiary of the MWL. Accordingly, Prince Talal has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

5. Representatives of the Kingdom of Saudi Arabia's Supreme Council of Islamic Affairs and Ministry of Islamic Affairs Who Served Between 1992 and 2002.

Address: Upon information and belief, those individuals reside in the Kingdom of

Saudi Arabia.

Subject: The Supreme Council of Islamic Affairs and the Ministry of Islamic Affairs have information and knowledge regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Wa'el Hamza Jelaidan

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: According to Jelaidan's Curriculum Vitae, he was a Director for the Muslim World League ("MWL") from approximately 1989-1994. The MWL is the parent organization of the IIRO. Jelaidan also ran the IIRO's branch office in Peshawar, Pakistan, and maintained close ties with the Director of the IIRO's branch office in the Philippines, Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups). Accordingly, Jelaidan has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Jelaidan further has knowledge and information regarding the MWL's and IIRO's relationship with, and employment of, Mohammed Jamal Khalifa.

7. Dr. Ahmed Muhammad Ali

Address: Unknown.

Subject: Dr. Ali served as the Secretary General of the MWL and further served as a member of the IIRO's Board of Directors. Accordingly, Dr. Ali has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. Sheikh Muhammad bin Nasser al Abudi

Address: Unknown.

Subject: Sheikh Abudi served as the Deputy Secretary General of the MWL and further served as a member of the IIRO's Board of Directors. Accordingly, Sheikh Abudi has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Dr. Abd al Rahman Habanka al Midani

Address: Unknown.

Subject: Dr. Midani served as a member of the MWL Constituent Council and further served as a member of the IIRO's Board of Directors. Accordingly, Dr.

Midani has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Dr. Hassan bin Ali al Ahadal

Address: Unknown.

Subject: Dr. Ahadal served as MWL's Financial and Administrative Affairs Manager and further served as a member of the IIRO's Board of Directors. Accordingly, Dr. Ahadal has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. Sheikh Hassan bin Ali Said Marfak

Address: Unknown.

Subject: Sheikh Marfak served as a member of the MWL Constituent Council and further served as a member of the IIRO's Board of Directors. Accordingly, Sheikh Marfak has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

12. Sheikh Abd al Rahman Yaakub

Address: Unknown.

Subject: Sheikh Yaakub served as a member of the MWL Constituent Council and further served as a member of the IIRO's Board of Directors. Accordingly, Sheikh Yaakub has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

13. Sheikh Khaled Kiba

Address: Unknown.

Subject: Sheikh Kiba served as a member of the MWL Constituent Council and further served as a member of the IIRO's Board of Directors. Accordingly, Sheikh Kiba has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

14. Dr, Muhammad Abda al Yamani
Address: Unknown.
Subject: Dr. Yamani served as a member of the MWL Constituent. Accordingly, Dr. Yamani has knowledge and information regarding: (i) the operations, policies, and activities of the MWL (and its subsidiary organization, the IIRO); and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
15. Abdullah M. Noshan
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Noshan served as the Director of the MWL's branch office in the United States. Accordingly, Nohsan has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
16. Khalid M. Fadllala
Address: Unknown.
Subject: Fadllala served as the Secretary and Treasurer of the MWL's branch office in the United States. Accordingly, Fadllala has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
17. Dr. Saleh H. Saqri
Address: Unknown.
Subject: Saqri served as the Director of the MWL's branch office in New York from 1989-1999. Accordingly, Saqri has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
18. Abd al Bassat Az al Din
Address: Unknown.
Subject: Din served as the Director of the MWL's branch office in London. Accordingly, Din has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
19. Abd al Hadi Daguit
Address: Unknown.
Subject: Daguit served as the Director of the MWL's branch office in Manila, Philippines following Mohammed Jamal Khalifa, brother-in-law to Osama bin

Laden and senior al Qaeda member. According to the U.S. government, Daguit was “a trusted associate of Khalifa.” Accordingly, Daguit has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

20. **Abd al Qadr Abdullah**
Address: Unknown.
Subject: Abdullah served as the MWL’s representative in the Philippines in the early 1990s. Accordingly, Abdullah has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
21. **Abdullah bin Ibrahim al Sahibani**
Address: Unknown.
Subject: Sahibani served as the Director of the MWL’s branch office in Indonesia from 1997-2002. Accordingly, Sahibani has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
22. **Fauzi bin Hassan bin Muhammad Jamal**
Address: Unknown.
Subject: Jamal served as the Director of the MWL’s branch office in Indonesia from 2002-2004. Accordingly, Jamal has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
23. **Fahd bin Muhammad Sand al Harbi**
Address: Unknown.
Subject: Harbi served as the Director of the MWL’s branch office in Indonesia beginning in 2004. Accordingly, Harbi has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
24. **Bassam A. Alim**
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Alim served as the Director of the MWL’s branch office in the United States. Accordingly, Alim has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

25. Amin Aqeel Attas
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Attas served as the MWL's Assistant Secretary General for Finance and Administration. Accordingly, Attas has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
26. Jamal al Fadl
Address: Upon information and belief, the individual is currently in witness protection and can be contacted through the U.S. Department of Justice.
Subject: Al Fadl is a former al Qaeda official and close associate to Osama bin Laden who defected from the terror organization, became a cooperating witness for the United States, and testified at length during the United States trial on the 1998 U.S. Embassy bombings in Africa. Al Fadl has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Details of al Fadl's knowledge are presented in his publicly available interrogation, interviews, court testimony, and FBI 302 statements.
27. Wadih El Hage
Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.
Subject: El Hage is a former employee of the MWL, a former leader of an East African al Qaeda cell, and served as Osama bin Laden's personal secretary. El Hage was convicted for his role in the 1998 U.S. Embassy bombings in Africa. El Hage has knowledge and information regarding the MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
28. Enaam Arnaout
Address: Upon information and belief, the individual currently resides in Illinois.
Subject: Arnaout worked closely with Osama bin Laden, Wa'el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive Officer for the Benevolence International Foundation (an Executive Order 1322 designated entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding the

MWL's operations, policies, and activities, including the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

29. M. Yaqub Mirza

Address: Upon information and belief, the individual resides in the United States and can be contacted through the attorneys at Luque Marino, 910 17th Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: In the years leading up to the September 11, 2001 terrorist attacks, Mirza served in various positions with the MWL's branch office in the United States – Director, Secretary, Treasurer, and Registered Agent. Mirza has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Additionally, Mirza served as a long-time board member for Sana-Bell, Inc. and Sanabel al Kheer, Inc. Officials from the MWL and IIRO simultaneously held positions on those boards with Mirza, thus giving him further knowledge and information regarding the operations, policies, and activities of the MWL and IIRO.

30. Zacarias Moussaoui

Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.

Subject: Moussaoui was an important figure within al Qaeda who had direct access and interactions with Osama bin Laden, Khalid Sheikh Mohammad, and other al Qaeda leadership. Moussaoui spent extensive time in Afghanistan around the al Qaeda leadership and trained at al Qaeda camps in the years leading up to the September 11th attacks. Osama bin Laden personally selected Moussaoui to create a database of financial donors to al Qaeda, which included the MWL.

Accordingly, Moussaoui has knowledge and information regarding the MWL's activities, including the allegations and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

31. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.

Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levey further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224

designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

32. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

33. Robert Werner

Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.

Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury's Assistant General Counsel for Enforcement and Intelligence and further served as Treasury's Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC's Director, Mr. Werner oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

34. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Ms. Hammerle further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and

Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil “for facilitating fundraising for al Qaida and affiliated terrorist groups.”

35. Adam J. Szubin

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Mr. Szubin served as the Director of the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”) from 2006-2015. Prior to taking that position in August 2006, Mr. Szubin served as the Senior Advisor to the Under Secretary for Terrorism and Financial Intelligence. In this capacity, he helped to develop and coordinate the implementation of policies on a range of issues, including terrorist financing, money laundering, sanctions programs, rogue regimes, WMD proliferation, and intelligence analysis. In his capacity as Director of OFAC, Mr. Szubin has knowledge and information regarding the United States government’s investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Szubin further has knowledge and information regarding the U.S. Department of the Treasury’s Executive Order 13224 designations of the IIRO’s Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil “for facilitating fundraising for al Qaida and affiliated terrorist groups.” Mr. Szubin became Treasury’s Under Secretary for Terrorism and Financial Intelligence in 2015.

36. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury’s Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government’s investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levitt further has knowledge and information regarding the U.S. Department of the Treasury’s Executive Order 13224 designations of the IIRO’s Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil “for facilitating fundraising for al Qaida and affiliated terrorist groups.”

37. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1616 Rhode Island Avenue, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department’s domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department’s powers to

advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

38. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 155 N. Wacker Drive, Chicago, Illinois 60606.

Subject: Fitzgerald served as the United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

39. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

40. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

41. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Homeland Security.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Muslim World League. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

42. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W.,

Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Muslim World League. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

43. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Muslim World League. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

44. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through Leidos, Inc., 11951 Freedom Drive, Reston, VA 20190.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center (“NCTC”) on June 12, 2008, upon his confirmation by the U.S. Senate and after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter’s leadership, served as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC were responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the Muslim World League, that have demonstrated sustained and active support for terrorist organizations willing to

attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of the MWL; and (ii) the allegations, investigations, and facts concerning the MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

45. Mark Rossini

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Rossini is a former FBI Special Agent who served as the FBI's liaison to the Central Intelligence Agency's Bin Laden Issue Station. Mr. Rossini has knowledge and information regarding the United States government's investigations of the MWL (and its subsidiary organization, the IIRO), for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

B. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the International Islamic Relief Organization ("IIRO"), Abdullah Omar Naseef, Abdullah bin Saleh al Obaid, Abdullah Muhsen al Turki, and Adnan Basha. Individuals include, but are not limited to:

1. Dr. Adnan Khalil Basha

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Dr. Basha served as Secretary General to the International Islamic Relief Organization ("IIRO") and held that position since approximately 1997. Given his long tenure with the IIRO and his simultaneous relationship with the MWL (IIRO's parent organization), Dr. Basha has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Dr. Basha further has knowledge and information regarding the following: (i) IIRO's relationship with, and employment of, al Qaeda senior members Wa'el Hamza Jelaidan and Mohammed Jamal Khalifa; (ii) IIRO's support for al Qaeda fighters and their training camps in Afghanistan, Bosnia, Pakistan, Kashmir, and other regions; (iii) IIRO's relationship with, and employment of, Executive Order 13224 designee Abd al Hamid Suliaman al Mujil; (iv) IIRO's support for al Qaeda and affiliated terror groups through the IIRO's branch offices in the Philippines and Indonesia; and (v) IIRO's support to the Taliban. Dr. Basha also served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Dr. Basha has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist

organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

2. Dr. Abdullah bin Abdul Mohsen al Turki
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.
Subject: Dr. al Turki is the current Secretary General of the Muslim World League (“MWL”), the parent organization of the IIRO. In his capacity as Secretary-General, Dr. al Turki has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO’s and MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Further, Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. al Turki’s authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities’ provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Turki has knowledge and information regarding the IIRO’s relationship with, and employment of, Wa’el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden) and Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups).
3. Dr. Abdullah bin Saleh al Obaid
Address: Upon information and belief, the individual can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.
Subject: Dr. al Obaid served as Secretary General of the MWL from approximately 1995-2000, the parent organization of the IIRO. Dr. al Obaid further served as President of the IIRO Executive Council. Accordingly, Dr. al Obaid has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO’s and MWL’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding the IIRO’s relationship with, and employment of, Wa’el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden) and Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups).
4. Dr. Abdullah Omar Naseef
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Dr. Naseef served as Secretary General of the MWL from approximately 1983-1993, the parent organization of the IIRO. Accordingly, Dr. Naseef has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's presence in Pakistan and Afghanistan during the Soviet-Afghan war and their activities in support of the mujahideen fighters; and (iii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding the IIRO's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

5. Representatives of the Kingdom of Saudi Arabia's Supreme Council of Islamic Affairs and Ministry of Islamic Affairs Who Served Between 1992 and 2002.
Address: Upon information and belief, those individuals reside in the Kingdom of Saudi Arabia.
Subject: The Supreme Council of Islamic Affairs and the Ministry of Islamic Affairs have information and knowledge regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Wa'el Hamza Jelaidan
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.
Subject: According to Jelaidan's Curriculum Vitae, he was a Director for the Muslim World League ("MWL") from approximately 1989-1994. The MWL is the parent organization of the IIRO. Jelaidan also ran the IIRO's branch office in Peshawar, Pakistan, and maintained close ties with the Director of the IIRO's branch office in the Philippines, Mohammed Jamal Khalifa. Jelaidan has knowledge and information regarding the following: (i) the founding of al Qaeda, including the financial infrastructure created to support the terror group; (ii) al Qaeda's use of purported charitable organizations, such as the MWL and IIRO, to financially and materially support Osama bin Laden, al Qaeda, and affiliated terrorist organizations; (iii) the MWL's and IIRO's support for al Qaeda fighters and their training camps in Afghanistan, Pakistan, Kashmir, and other regions; and (iv) Jelaidan's use of the IIRO branch office in Peshawar, Pakistan to provide IIRO identification cards to al Qaeda fighters and other mujihadeen to get them across the Afghan-Pakistan border, and to facilitate the purchase of weapons for al Qaeda.

7. Ibrahim Afandi
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mr. Afandi served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its

investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Afandi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc. Moreover, Mr. Afandi served on the board of the IIRO in Kosovo. Accordingly, Mr. Afandi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO in Kosovo; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. **Mustafa Muhammed Idris**
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mr. Idris served on the board of the IIRO in Kosovo. Accordingly, Mr. Idris has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO in Kosovo; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. **Mahmud bin Abdullah Taibah**
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mr. Taibah served on the board of the IIRO in Kosovo. Accordingly, Mr. Taibah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO in Kosovo; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. **Prince Turki bin Jalawi al Saud**
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Prince Turki is the former head of the IIRO's Eastern Province branch office in the Kingdom of Saudi Arabia, and further served as an official of the Saudi Joint Relief Committee ("SJRC"), of which the IIRO is a member. Accordingly, Prince Turki has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. **Abd al Hamid Sulaiman al Mujil**
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Al Mujil has worked for the IIRO for approximately 18+ years, serving 15+ of those years as the Executive Director of the IIRO Eastern Province branch

office in the Kingdom of Saudi Arabia. In his capacity as the Executive Director, al Mujil oversees and controls the operations of the Eastern Province branch which includes providing financial support to overseas IIRO branch offices such as those in the Philippines and Indonesia. On August 3, 2006, the U.S. Department of the Treasury designated al Mujil pursuant to Executive Order 13224 for using his position with the IIRO to bankroll the al Qaeda network, to support Islamic militant groups, and to fundraise for terror organizations such as the Abu Sayyaf Group and Jemmah Islamiyah. Accordingly, al Mujil has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

12. Suleiman Abdulaziz al Rajhi
Address: Upon information and belief, the individual can be contacted through the Al Rajhi Banking and Investment Corporation, Riyadh, Saudi Arabia or through the attorneys at Fish & Richardson, 717 Main Street, Suite 5000, Dallas, Texas 75201.
Subject: Al Rajhi served as a member of the IIRO Executive Council. Accordingly, al Rajhi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
13. Dr. Salim Ahmed bin Mahfouz
Address: Unknown.
Subject: Bin Mahfouz served as Director of the IIRO's branch offices in Slovenia and Albania. Accordingly, bin Mahfouz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
14. Zaher Abd al Aziz
Address: Unknown.
Subject: Aziz served as the Executive Director of the IIRO's branch offices in the Balkans. Accordingly, Aziz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
15. Husam 'Aabidin
Address: Unknown.
Subject: Aabidin served as the IIRO's Financial Affairs Supervisor for the Balkans. Accordingly, Aabidin has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

16. Dr. Ghazi Mahfouz Felemban
Address: Unknown.
Subject: Felemban served as the IIRO's Assistant Director General for Finance. Accordingly, Aziz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
17. Zidene Boukhalifa
Address: Unknown.
Subject: Boukhalifa served as the Executive Director of the IIRO's branch offices in the Balkans following the removal of Zaher Abd al Aziz. Accordingly, Boukhalifa has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
18. Muhammad Afdal Shima
Address: Unknown.
Subject: Shima served as Director of the IIRO's branch office in Pakistan from 1994-1998. Accordingly, Shima has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
19. Mua'yad bin Abd al Wahid al Butairi
Address: Unknown.
Subject: Butairi served as Director of the IIRO's branch office in Pakistan from 1998-2001. Accordingly, Butairi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
20. Rahmatullah Nazir Khan Qari
Address: Unknown.
Subject: Qari served as Director of the IIRO's branch office in Pakistan following Butairi's removal in 2001. Accordingly, Qari has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
21. Abdul Aziz Abdullah al Bashawari
Address: Unknown.
Subject: Bashawari served as Head of the IIRO's Finances and Administrative Monitoring Administration. Accordingly, Qari has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the

allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. **Hidar Sidat**
Address: Unknown.
Subject: Sidat was hired by the IIRO to audit the IIRO's branch office in Pakistan. Accordingly, Sidat has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
23. **Saleh bin Abdullah al Seikhan**
Address: Unknown.
Subject: Seikhan served as the IIRO's Financial Manager at its headquarters in Saudi Arabia. Accordingly, Seikhan has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
24. **Bader a Din Abd al Wahab**
Address: Unknown.
Subject: Wahab served as the Director of the IIRO's branch office in Sarajevo. Accordingly, Laham has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
25. **Zakaria Mohamed Sheikh**
Address: Unknown.
Subject: Sheikh served as the Regional Director for East Africa and Assistant Director for the IIRO's branch office in the Philippines. Accordingly, Sheikh has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
26. **Abd al Hadi Daguit**
Address: Unknown.
Subject: Daguit served as the Director of the IIRO's branch office in Manila, Philippines from 1996-1998, following Mohammed Jamal Khalifa, brother-in-law to Osama bin Laden and senior al Qaeda member. According to the U.S. government, Daguit was "a trusted associate of Khalifa." Accordingly, Daguit has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

27. Hamud al Laham
Address: Unknown.
Subject: Laham served as the Director of the IIRO's branch office in Manila, Philippines. Accordingly, Laham has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
28. Abdullah bin Ibrahim al Sahibani
Address: Unknown.
Subject: Sahibani served as the Director of the IIRO's branch office in Indonesia from 1997-2002. Accordingly, Sahibani has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
29. Fauzi bin Hassan bin Muhammad Jamal
Address: Unknown.
Subject: Jamal served as the Director of the IIRO's branch office in Indonesia from 2002-2004. Accordingly, Jamal has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
30. Fahd bin Muhammad Sand al Harbi
Address: Unknown.
Subject: Harbi served as the Director of the IIRO's branch office in Indonesia beginning in 2004. Accordingly, Harbi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
31. Muhammad Banoun
Address: Unknown.
Subject: Banoun served as an employee of the IIRO's branch office in Indonesia. Accordingly, Banoun has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
32. Yusuf bin Salem al Ghanem
Address: Unknown.
Subject: Ghanem served as the Director of the IIRO's branch offices in Albania and Kosovo. Accordingly, Ghanem has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

33. Walid S.A. Hamed (a/k/a A/ Hammeed)
Address: Unknown.
Subject: Hamed served as the Director of the IIRO's branch office in Albania. Accordingly, Hamed has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
34. Nazia Ahmad Sandi
Address: Unknown.
Subject: Sandi served as the manager of the IIRO's branch offices in Albania and Kosovo. Accordingly, Sandi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
35. Saleh bin Ahmed al Thibani
Address: Unknown.
Subject: Thibani served as the manager of the IIRO's branch office in Albania. Accordingly, Thibani has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
36. Sa'ed al Ubeidi
Address: Unknown.
Subject: Ubeidi served as the manager of the IIRO's branch office in Kosovo. Accordingly, Ubeidi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
37. Ahmad bin Naf'e al Harbi
Address: Unknown.
Subject: Harbi served as the Supervisor of the IIRO's branch offices in the Balkans. Accordingly, Harbi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
38. El Fatih Hassanein
Address: Unknown.
Subject: Hassanein served as the Director of the IIRO's branch office in Vienna. Accordingly, Hassanein has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

39. Sukarno Hassanein
Address: Unknown.
Subject: Hassanein served as the Deputy Director of the IIRO's branch office in Vienna. Accordingly, Hassanein has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
40. Fouad Mahafzah
Address: Unknown.
Subject: Mahafzah served as the Director of the IIRO's branch office in Tuzla. Accordingly, Mahafzah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
41. Muhammad bin Abdullah Taiba
Address: Unknown.
Subject: Taiba served as the President of Al Haramain al Masjid al Aqsa and further served as a member of the IIRO's Board of Directors. Accordingly, Taiba has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
42. Muhammad bin Abdullah al Dubayban
Address: Unknown.
Subject: Dubayban served as Board Member of Al Haramain al Masjid al Aqsa and further served as a member of the IIRO's Board of Directors. Accordingly, Dubayban has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
43. Uthman bin Abdul Kader Hafez
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mr. Hafex served as the Chief Executive officer of Sanabel al Khair-Saudi Arabia. Accordingly, Mr. Hafez has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
44. Saleh Kamel
Address: Upon information and belief, the individual resides in the Kingdom of

Saudi Arabia.

Subject: Kamel served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Kamel has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

45. Mr. Khaled bin Hamed Zini

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Zini served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Zini has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

46. Mr. Abdullah bin Salem bin Mahfuz

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Mahfuz served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Mahfuz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

47. Mr. Talal bin Muhammad Badkuk

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Badkuk served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Badkuk has knowledge and information regarding: (i) the

operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

48. Mr. Mazen bin Muhammad Batterji

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Batterji served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Batterji has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

49. Dr. Abdullah bin Abd al Aziz al Muslah

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Dr. Muslah served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Dr. Muslah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

50. Dr. Yusuf bin Abdullah Bassudan

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Dr. Bassudan served as the IIRO's Deputy Secretary General for Financial and Administrative Affairs. Dr. Bassudan also served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Dr. Bassudan has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support

to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

51. Sheikh Abd al Rahman Abd al Kader Faqih
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Sheikh Faquih served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Sheikh Faquih has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
52. Ibrahim bin Muhammad al Jamih
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mr. Jamih served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Jamih has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
53. Ahmad Muthar
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mr. Muthar served as legal counsel to the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Muthar has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
54. Sheikh Saleh al Zamal
Address: Upon information and belief, the individual resides in the Kingdom of

Saudi Arabia.

Subject: Sheikh Zamal served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Sheikh Zamal has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

55. Sheikh Mari bin Mafuz

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Sheikh Mafuz served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Sheikh Mahfuz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

56. Sharif Mansur Abu Riyash

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Riyash served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Riyash has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

57. Abd al Aziz Randora

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Randora served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Randora has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin

Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

58. Ali Bashawari

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Bashawari served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Bashawari has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

59. Saleh Ahmad Ba-aboud

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Ba-aboud is the Director of the IIRO's branch offices located around the globe. Positioned at IIRO's headquarters in Saudi Arabia, Ba-aboud monitors and supervises the activities of the IIRO branch offices. Accordingly, Ba-aboud has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and its branch offices; (ii) the extensive reporting the branch offices are required to provide to the IIRO headquarters throughout the year; and (iii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

60. Dr. Ali bin Ibrahim al Namleh

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Dr. Namleh is the former Saudi Minister of Labor and Social Affairs and served as the representative of King Fahd during various delegations to Kosovo. Dr. Namleh oversaw numerous charitable projects in Kosovo undertaken by many of the Saudi charities including the IIRO, Saudi Joint Relief Committee, Saudi Red Crescent, Al Haramain Islamic Foundation, and World Assembly of Muslim Youth. Accordingly, Dr. Namleh has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

61. Muhammad al Zawahiri

Address: Unknown.

Subject: Zawahiri was an employee of the IIRO's branch office in Albania from 1993 through at least 2000. Zawahiri is the younger brother of al Qaeda leader Ayman al Zawahiri. Muhammad al Zawahiri was in command of terrorist cells in

Albania during the 1990s and was responsible for finding jobs for jihadists with Islamic charities, including the IIRO. Accordingly, Zawahiri has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

62. Jamal al Fadl

Address: Upon information and belief, the individual is currently in witness protection and can be contacted through the U.S. Department of Justice.

Subject: Al Fadl is a former al Qaeda official and close associate to Osama bin Laden who defected from the terror organization, became a cooperating witness for the United States, and testified at length during the United States trial on the 1998 U.S. Embassy bombings in Africa. Al Fadl has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO and MWL; and (ii) the allegations, investigations, and facts concerning the IIRO's and MWL's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Al Fadl further has knowledge and information regarding the following: (i) the IIRO's direct support to members of al Qaeda by providing them with false identification thereby enabling them to cross the Pakistan-Afghanistan border for training at al Qaeda camps; (ii) Wa'el Hamza Jelaidan's employment with the IIRO and how Jelaidan used the IIRO office in Pakistan to facilitate the purchase of weapons for al Qaeda; and (iii) Mohammed Jamal Khalifa's employment with the IIRO and Khalifa's close relationship with Osama bin Laden.

63. Randall Todd Royer (a/k/a Ismail Royer)

Address: Upon information and belief, the individual is currently incarcerated by the United States and can be contacted through the U.S. Department of Justice.

Subject: Royer is a former American mujahideen recruit who participated in the Bosnian jihad and has admitted to U.S. authorities that he aided and abetted a number of individuals in gaining entry to terrorist training camps in Pakistan for weapons and military training. Royer has further stated that the IIRO was well known for its reputation as a front for jihad and for assisting mujahideen fighters get into Bosnia using IIRO identification cards. Accordingly, Royer has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

64. Enaam Arnaout

Address: Upon information and belief, the individual currently resides in Illinois.

Subject: Arnaout worked closely with Osama bin Laden, Wa'el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive

Officer for the Benevolence International Foundation (an Executive Order 1322 designated entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding the IIRO's operations, policies, and activities, including the allegations, investigations, and facts concerning IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

65. M. Yaqub Mirza

Address: Upon information and belief, the individual resides in the United States and can be contacted through the attorneys at Luque Marino, 910 17th Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: In the years leading up to the September 11, 2001 terrorist attacks, Mirza served in various positions with the MWL's branch office in the United States – Director, Secretary, Treasurer, and Registered Agent. By virtue of his relationship with the MWL, Mirza has knowledge and information regarding the IIRO's activities in the United States and abroad, including but not limited to: (i) the allegations, investigations, and facts concerning the IIRO's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; and (ii) the allegations, investigations, and facts concerning the IIRO's assistance, financial or otherwise, to defendants Sana-Bell, Inc. and Sanabel al Kheer.

66. Zacarias Moussaoui

Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.

Subject: Moussaoui was an important figure within al Qaeda who had direct access and interactions with Osama bin Laden, Khalid Sheikh Mohammad, and other al Qaeda leadership. Moussaoui spent extensive time in Afghanistan around the al Qaeda leadership and trained at al Qaeda camps in the years leading up to the September 11th attacks. Osama bin Laden personally selected Moussaoui to create a database of financial donors to al Qaeda, which included the IIRO. Accordingly, Moussaoui has knowledge and information regarding the IIRO's activities, including the allegations and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

67. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.

Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his

capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levey further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

68. Robert Werner

Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.

Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury's Assistant General Counsel for Enforcement and Intelligence and further served as Treasury's Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC's Director, Mr. Werner oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has knowledge and information regarding the United States government's investigations of the IIRO for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

69. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Ms. Hammerle further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

70. Adam J. Szubin

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Mr. Szubin served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2006-2015. Prior to taking that position in August 2006, Mr. Szubin served as the Senior Advisor to the Under Secretary for Terrorism and Financial Intelligence. In this capacity, he

helped to develop and coordinate the implementation of policies on a range of issues, including terrorist financing, money laundering, sanctions programs, rogue regimes, WMD proliferation, and intelligence analysis. In his capacity as Director of OFAC, Mr. Szubin has knowledge and information regarding the United States government's investigations of the IIRO for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Szubin further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups." Mr. Szubin became Treasury's Under Secretary for Terrorism and Financial Intelligence in 2015.

71. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levitt further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designations of the IIRO's Philippine and Indonesian branch offices, as well as senior IIRO official Abd al Hamid Sulaiman al Mujil "for facilitating fundraising for al Qaida and affiliated terrorist groups."

72. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of the IIRO and MWL for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

73. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1616 Rhode Island Avenue, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing

and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of the IIRO for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

74. Ambassador Philip C. Wilcox, Jr.

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Middle East Institute, 1761 N Street, N.W., Washington, D.C. 20036.

Subject: Ambassador Wilcox has a long history with the U.S. Department of State, including serving as Deputy Assistant Secretary of State for Intelligence and Research and as Ambassador at Large and Coordinator for Counter Terrorism. Ambassador Wilcox has knowledge and information regarding the following: (i) the operations, policies, and activities of the IIRO; (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations; and (iii) the IIRO's relationship with, and employment of, Mohammed Jamal Khalifa (co-founder of al Qaeda and financier of associated terror groups).

75. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 155 N. Wacker Drive, Chicago, Illinois 60606.

Subject: Fitzgerald served as the United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

76. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

77. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

78. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Homeland Security.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the International Islamic Relief Organization. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

79. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the International Islamic Relief Organization. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

80. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States (“9/11 Commission”), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille’s analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the International

Islamic Relief Organization. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

81. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through Leidos, Inc., 11951 Freedom Drive, Reston, VA 20190.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center ("NCTC") on June 12, 2008, upon his confirmation by the U.S. Senate and after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter's leadership, served as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC were responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the International Islamic Relief Organization, that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

82. Mark Rossini

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Rossini is a former FBI Special Agent who served as the FBI's liaison to the Central Intelligence Agency's Bin Laden Issue Station. Mr. Rossini has knowledge and information regarding the United States government's investigations of the IIRO for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

83. Samir N. Al Hasan

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Al Hasan traveled to Afghanistan from Yemen in 1999 or 2000, attended the training camp at al Farouq, and became an al Qaeda bodyguard in August 2001. Al Hasan told U.S. authorities that he was in Afghanistan as a relief worker for the IIRO and that he received the position from the head of the IIRO. According to the Department of Defense: "The International Islamic Relief Organization was identified as an Islamic humanitarian organization with headquarters in Mecca, Saudi Arabia, and is financed by Usama bin Laden." Al Hasan has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of

financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

84. Tariq Mahmoud Ahmed al Sawah

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Al Sawah lived in Bosnia and Croatia where he worked as a relief worker for the IIRO. He chose to go to the Balkans region after watching videos depicting the atrocities committed by Serbs against Bosnians, and eventually joined the Bosnian Third Army, whose members were predominantly Arab Mujahedin fighters. Al Sawah was expelled from Bosnia in 2000 and traveled to Afghanistan where he attend the al Farouq training camp and further served as an advanced explosives trainer at the Tarnak Farm training camp. Further, he authored a 400 page manuscript containing bomb-making techniques and provided it to al Qaida members. Al Sawah further met Ayman al Zawahiri in 2002 and also attended a banquet dinner with Osama bin Laden and a senior al Qaida lieutenant. Moreover, al Sawah's design for a shoe bomb technically matched the design of the shoe bomb used by Richard Reid in his failed attempt to bring down American Airlines Flight 63. Al Sawah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

85. Khalid Sheikh Mohammed

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Khalid Sheikh Mohammed ("KSM") is a former senior member of al Qaeda and the mastermind of the September 11 attacks. The IIRO allegedly provided KSM with IIRO identification/employment cards during the Bosnian war so that KSM could enter the region to conduct jihad. Accordingly, KSM has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO; and (ii) the allegations, investigations, and facts concerning the IIRO's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

C. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the World Assembly of Muslim Youth ("WAMY"). Individuals include, but are not limited to:

1. Dr. Saleh al Wohaibi

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at the Law Firm of Omar T. Mohammedi, LLC, Woolworth Building, 233 Broadway, Suite 801, New York, NY 10279.

Subject: Dr. Wohaibi currently serves as the Secretary General for the World

Assembly of Muslim Youth (“WAMY”). In his capacity as Secretary-General, al Wohaibi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

2. Dr. Abdullah bin Abdul Mohsen al Turki
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.
Subject: Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. al Turki’s authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities’ provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, particularly as they relate to WAMY.
3. Prince Turki bin Jalawi al Saud
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Prince Turki served as official of the Saudi Joint Relief Committee (“SJRC”), of which WAMY is a member. In his capacity as an official of the SJRC, Prince Turki has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
4. Prince Bandar bin Sultan al Saud
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Prince Bandar served as the Kingdom of Saudi Arabia’s Ambassador to the United States from 1983-2005. During that time, Prince Bandar played an important role in the establishment and funding of WAMY’s branch office in the United States. Accordingly, Prince Bandar has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
5. Representatives of the Kingdom of Saudi Arabia’s Supreme Council of Islamic Affairs and Ministry of Islamic Affairs Who Served Between 1992 and 2002.
Address: Upon information and belief, those individuals reside in the Kingdom of Saudi Arabia.
Subject: The Supreme Council of Islamic Affairs and the Ministry of Islamic

Affairs have information and knowledge regarding: (i) the operations, policies, and activities of the WAMY; and (ii) the allegations, investigations and facts concerning the WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Dr. Abdul Wahab A. Noorwali
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Dr. Noorwali served as WAMY's Assistant Secretary-General. Accordingly, Dr. Noorwali has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
7. Dr. Ibrahim bin Hamad al Quayid
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Dr. Quayid served as WAMY's Assistant Secretary-General in Riyadh. Accordingly, Dr. Quayid has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
8. Dr. Abdul Rahman Abdul Aziz al Rabee'ah
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Dr. Rabee'ah served as WAMY's Assistant Secretary-General for WAMY's Eastern Province branch. Accordingly, Dr. Rabee'ah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
9. Dr. Hamid bin Kalil al Shaiji
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Dr. Shaiji served as WAMY's Assistant Secretary-General. Accordingly, Dr. Shaiji has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
10. Dr. Sa'ed al Hamidi
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Dr. Hamidi served as WAMY's Assistant Secretary-General for WAMY's Southern Province branch. Accordingly, Dr. Hamidi has knowledge and

information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. Dr. Saleh bin Abd al Ziz bin Muhammad al Sheikh
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Dr. al Sheikh served as WAMY's President and Minister of Islamic Affairs. Accordingly, Dr. al Sheikh has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
12. Dr. Saleh bin Ibrahim Babaeer
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Dr. Babaeer served as WAMY's Assistant Secretary-General for Overseas Offices. Accordingly, Dr. Babaeer has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
13. Mohammed al Khatib
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Khatib served as Director of WAMY's branch office in Canada from 1998-2001. Accordingly, Khatib has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
14. Talhah al Jarad
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Jarad served as Director of WAMY's branch office in Canada from 2001-2004. Accordingly, Jarad has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
15. Ayman al Taher
Address: Upon information and belief, the individual resides in Canada.
Subject: Taher has served as Director of WAMY's branch office in Canada from 2004 through the present. Accordingly, Taher has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial

and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

16. Cathy Hawara

Address: Upon information and belief, the individual resides in Canada.

Subject: Ms. Hawara serves as the Director-General of the Canadian Revenue Agency (“CRA”), the branch of the Canadian government responsible for conducting an extensive investigation and audit of WAMY’s branch office in Canada. The investigation conducted by the CRA uncovered evidence that the WAMY branch office shared common officers, office space, contact information, and bank accounts with Executive Order 13224 Specially Designated Global Terrorist (“SDGT”) entity Benevolence International Fund-Canada (“BIF-Canada”). In addition, the CRA’s investigation discovered that the WAMY branch office was funding Executive Order 13224 SDGT entity Benevolence International Foundation (“BIF”) in the United States. In her capacity as Director-General of the CRA, Ms. Hawara has knowledge and information regarding the Canadian government’s investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

17. Ibrahim Sulayman Abdullah

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Abdullah served Deputy Director of WAMY’s branch office in the United States from 1999-2004. Accordingly, Abdullah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

18. Abdullah Awad bin Laden

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Bin Laden founded WAMY’s branch office in the United States and served as its President from 1992-2001. Accordingly, bin Laden has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

19. Mohammed Moustafa Mohammed

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Moustafa served as the Director General for WAMY’s office in Pakistan from 1990-2002. Accordingly, Moustafa has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial

and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

20. Ibrahim Anwar Ibrahim

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Ibrahim served as the Deputy Office Manager for WAMY's office in Pakistan. Accordingly, Ibrahim has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

21. Hassan bin Abdah Kadish

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Kadish served as the head of WAMY's Offices of Administration. Accordingly, Kadish has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. Said Rageah

Address: Upon information and belief, the individual resides in Scarborough, Canada.

Subject: Rageah was employed by WAMY in the United States prior to the September 11, 2001 attacks. Accordingly, Rageah has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

23. Fahad al Awadi

Address: Unknown.

Subject: Awadi served as the head of WAMY's branch office in London, United Kingdom. Accordingly, Awadi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

24. Sheikh Abdul al Majid bin Aziz al Zindani

Address: Unknown.

Subject: Sheikh Zindani is the founder and head of the Al Imam University in Yemen and worked closely with WAMY Secretary-General Dr. Manih ibn Hammad al Juhani and other WAMY officials. Zindani was designated as a Specially Designated Global Terrorist ("SDGT") by the U.S. Treasury Department on February 24, 2004. According to the U.S. government: "Abd Al Majid Zandani was an active supporter of Usama Bin Laden. Zandani was involved in raising

funds and recruiting volunteers for the Bin Laden organization. Zandani is also a religious and legal expert for Usama Bin Laden.” Accordingly, Zindani has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

25. Enaam Arnaout

Address: Upon information and belief, the individual currently resides in Illinois.

Subject: Arnaout worked closely with Osama bin Laden, Wa’el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive Officer for the Benevolence International Foundation (an Executive Order 1322 designated entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda’s activities around the globe. Accordingly, Arnaout has knowledge and information regarding WAMY’s operations, policies, and activities, including the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

26. Uwaysh bin Harbi al Ghamedi

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Ghamedi served as WAMY’s Assistant Secretary-General in Jeddah and further served on WAMY’s committee to oversee the operations of Lajnat al Birr al Islamiya, the precursor to the Benevolence International Foundation (“BIF”). Accordingly, Ghamedi has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

27. Adel Abdul Jalil Ibrahim Batterjee

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Batterjee is a former WAMY officer and founder of Lajnat al Birr al Islamiya, the precursor to the Benevolence International Foundation (“BIF”). Accordingly, Batterjee has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

28. Zacarias Moussaoui
Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.
Subject: Moussaoui was an important figure within al Qaeda who had direct access and interactions with Osama bin Laden, Khalid Sheikh Mohammad, and other al Qaeda leadership. Moussaoui spent extensive time in Afghanistan around the al Qaeda leadership and trained at al Qaeda camps in the years leading up to the September 11th attacks. Osama bin Laden personally selected Moussaoui to create a database of financial donors to al Qaeda, which included WAMY. Accordingly, Moussaoui has knowledge and information regarding WAMY's activities, including the allegations and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
29. Stuart A. Levey
Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.
Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
30. R. Richard Newcomb
Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.
Subject: Mr. Newcomb served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
31. Robert Werner
Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.
Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury's Assistant General Counsel for Enforcement and Intelligence and further served as Treasury's Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC's Director, Mr. Werner

oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations..

32. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

33. Adam J. Szubin

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Mr. Szubin served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2006-2015. Prior to taking that position in August 2006, Mr. Szubin served as the Senior Advisor to the Under Secretary for Terrorism and Financial Intelligence. In this capacity, he helped to develop and coordinate the implementation of policies on a range of issues, including terrorist financing, money laundering, sanctions programs, rogue regimes, WMD proliferation, and intelligence analysis. In his capacity as Director of OFAC, Mr. Szubin has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Szubin became Treasury's Under Secretary for Terrorism and Financial Intelligence in 2015.

34. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

35. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies,

1800 K Street, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

36. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 155 N. Wacker Drive, Chicago, Illinois 60606.

Subject: Fitzgerald served as the United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

37. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation,

Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

38. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

39. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Homeland Security.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the World Assembly of Muslim Youth. Mr. Roth has knowledge and information regarding: (i) the

operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

40. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the World Assembly of Muslim Youth. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

41. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the World Assembly of Muslim Youth. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

42. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through Leidos, Inc., 11951 Freedom Drive, Reston, VA 20190.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center ("NCTC") on June 12, 2008, upon his confirmation by the U.S. Senate and

after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter's leadership, served as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC were responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the World Assembly of Muslim Youth, that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of WAMY; and (ii) the allegations, investigations, and facts concerning WAMY's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

43. Mark Rossini

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Rossini is a former FBI Special Agent who served as the FBI's liaison to the Central Intelligence Agency's Bin Laden Issue Station. Mr. Rossini has knowledge and information regarding the United States government's investigations of WAMY for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

D. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the Al Haramain Islamic Foundation, Perouz Sedaghaty and Soliman al Buthe. Individuals include, but are not limited to:

1. Aqeel Abdelaziz al Aqil

Address: Unknown

Subject: Al Aqil is a founder and long-time leader of the Al Haramain Islamic Foundation, serving as its Chairman, Director General, and as the President of the al Haramain United States branch. Accordingly, al Aqil has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. An Executive Order 13224 designee himself, al Aqil further has knowledge and information regarding the following: (i) al Haramain's sponsorship of al Qaeda's operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee for Kosovo and Chechnya; (ii) al Haramain's funding of terror organizations designated by the United States government – Jemmah Islamiya, al Ittihad al Islamiya, Egyptian Islamic Jihad, HAMAS, and Lashkar e Taibah; and (iii) the Department of the Treasury's Executive Order 13224 designations of the al Haramain organization in its entirety for "providing financial and material support to the al Qaida network." Moreover, al Aqil has knowledge and information regarding the terror sponsorship activities of Perouz Sedgahaty and Soliman al Buthe.

2. Soliman al Buthe

Address: Upon information and belief, the individual can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Al Buthe is a co-founder of the al Haramain United States branch and further served as its Treasurer. Accordingly, al Buthe has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. An Executive Order 13224 designee himself, al Buthe further has knowledge and information regarding the following: (i) al Haramain's sponsorship of al Qaeda's operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee for Kosovo and Chechnya; (ii) al Haramain's funding of terror organizations designated by the United States government – Jemmah Islamiya, al Ittihad al Islamiya, Egyptian Islamic Jihad, HAMAS, and Lashkar e Taibah; and (iii) the Department of the Treasury's Executive Order 13224 designations of the al Haramain organization in its entirety for "providing financial and material support to the al Qaida network."

3. Perouz Sedaghaty

Address: Upon information and belief, the individual is incarcerated in the United States and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Sedaghaty is a co-founder of the al Haramain United States branch and further served as its Secretary. Accordingly, Sedaghaty has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. On September 9, 2010, a grand jury in Eugene, Oregon convicted Sedaghaty of two felonies relating to al Haramain's efforts to send nearly \$150,000 to support religious extremist militants in Chechnya. Sedaghaty further has knowledge and information regarding the following: (i) al Haramain's sponsorship of al Qaeda's operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee for Kosovo and Chechnya; (ii) al Haramain's funding of terror organizations designated by the United States government – Jemmah Islamiya, al Ittihad al Islamiya, Egyptian Islamic Jihad, HAMAS, and Lashkar e Taibah; and (iii) the Department of the Treasury's Executive Order 13224 designations of the al Haramain organization in its entirety for "providing financial and material support to the al Qaida network."

4. Mansour al Kadi

Address: Unknown

Subject: Al Kadi is a longtime employee of the Al Haramain Islamic Foundation, serving as its Deputy Director General, head of al Haramain's Africa Committee, and Vice-President of the al Haramain United States branch. Accordingly, al Kadi has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al

Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Al Kadi further has knowledge and information regarding the following: (i) al Haramain's sponsorship of al Qaeda's operations in Chechnya and Kosovo through its participation in the Saudi Joint Relief Committee for Kosovo and Chechnya; (ii) al Haramain's funding of terror organizations designated by the United States government – Jemmah Islamiya, al Ittihad al Islamiya, Egyptian Islamic Jihad, HAMAS, and Lashkar e Taibah; and (iii) the Department of the Treasury's Executive Order 13224 designations of the al Haramain organization in its entirety for "providing financial and material support to the al Qaida network." Moreover, al Kadi has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

5. Dr. Abdullah bin Abdul Mohsen al Turki
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.
Subject: Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd in 1993. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. The charities under Dr. al Turki's authority and supervision included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities' provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, particularly as they relate to al Haramain. Moreover, al Turki has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

6. Representatives of the Kingdom of Saudi Arabia's Supreme Council of Islamic Affairs and Ministry of Islamic Affairs Who Served Between 1992 and 2002.
Address: Upon information and belief, those individuals reside in the Kingdom of Saudi Arabia.
Subject: The Supreme Council of Islamic Affairs and the Ministry of Islamic Affairs have information and knowledge regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

7. Enaam Arnaout
Address: Upon information and belief, the individual currently resides in Illinois.
Subject: Arnaout worked closely with Osama bin Laden, Wa'el Hamza Jelaidan, Abu Rida al Suri, and Abu Hajer al Iraqi to build the al Qaeda support infrastructure. One of his chief responsibilities was to procure rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaeda. As the Chief Executive Officer for the Benevolence International Foundation (an Executive Order 1322

designated entity), Arnaout used BIF to provide financial and material support to al Qaeda and affiliated terror organizations. Arnaout and BIF worked closely with other purported charities, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Al Haramain Islamic Foundation, in connection with their efforts to sponsor al Qaeda's activities around the globe. Accordingly, Arnaout has knowledge and information regarding al Haramain's operations, policies, and activities, including the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. Ziauddin Eberle

Address: Upon information and belief, the individual currently resides in the United States.

Subject: Mr. Eberle was an employee of the Al Haramain Islamic Foundation in Pakistan during the 1990s and was recruited to return to the United States to manage al Haramain's Islamic Center in Springfield, Missouri. Accordingly, Mr. Eberle has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Daveed Gartenstein-Ross

Address: Upon information and belief, the individual currently resides in the United States and can be contacted through the Foundation for Defense of Democracies in Washington, D.C.

Subject: Mr. Gartenstein-Ross was an employee of the Al Haramain Islamic Foundation, Inc. Accordingly, Mr. Gartenstein-Ross has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of material and financial support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mr. Gartenstein-Ross has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

10. Zacarias Moussaoui

Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.

Subject: Moussaoui was an important figure within al Qaeda who had direct access and interactions with Osama bin Laden, Khalid Sheikh Mohammad, and other al Qaeda leadership. Moussaoui spent extensive time in Afghanistan around the al Qaeda leadership and trained at al Qaeda camps in the years leading up to the September 11th attacks. Osama bin Laden personally selected Moussaoui to create a database of financial donors to al Qaeda, which included al Haramain. Accordingly, Moussaoui has knowledge and information regarding al Haramain's activities, including the allegations and facts concerning al Haramain's provision of

financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.

Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States. Moreover, Mr. Levey has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

12. Mark. D. Roberts

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Roberts was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Roberts has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States. Moreover, Mr. Roberts has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

13. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy

and national security goals. Mr. Newcomb has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States. Moreover, Mr. Newcomb has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

14. Robert Werner

Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.

Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury's Assistant General Counsel for Enforcement and Intelligence and further served as Treasury's Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC's Director, Mr. Werner oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States. Moreover, Mr. Werner has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

15. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi

Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States. Moreover, Ms. Hammerle has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

16. Adam J. Szubin

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Mr. Szubin served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2006-2015. Prior to taking that position in August 2006, Mr. Szubin served as the Senior Advisor to the Under Secretary for Terrorism and Financial Intelligence. In this capacity, he helped to develop and coordinate the implementation of policies on a range of issues, including terrorist financing, money laundering, sanctions programs, rogue regimes, WMD proliferation, and intelligence analysis. In his capacity as Director of OFAC, Mr. Szubin has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States. Moreover, Mr. Szubin has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe. Mr. Szubin became Treasury's Under Secretary for Terrorism and Financial Intelligence in 2015.

17. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of the Al Haramain Islamic Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, including the Treasury Departments' Executive Order 13224 designations of: (i) al Haramain's headquarters in Saudi Arabia; (ii) al Haramain officials Aqeel Abdelaziz al Aqil and Soliman al Buthe; and (iii) al Haramain's branch offices in Afghanistan, Albania, Bangladesh, Bosnia & Herzegovina, Comoros Islands, Ethiopia, Indonesia, Kenya, Netherlands, Pakistan, Somalia, Tanzania, and the United States. Moreover, Mr. Levitt has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

18. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1616 Rhode Island Avenue, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of al Haramain for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mr. Zarate has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

19. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

20. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas

and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps.

21. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 155 N. Wacker Drive, Chicago, Illinois 60606.

Subject: Fitzgerald served as the United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps.

22. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Homeland Security.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those

persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Al Haramain Islamic Foundation. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mr. Roth has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

23. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Al Haramain Islamic Foundation. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mr. Greenburg has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

24. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Al Haramain Islamic Foundation. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain's provision of financial and

material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Ms. Wille has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

25. Michael E. Leiter

Address: Upon information and belief, the individual resides in the United States and can be contacted through Leidos, Inc., 11951 Freedom Drive, Reston, VA 20190.

Subject: Mr. Leiter was sworn in as the Director of the National Counterterrorism Center (“NCTC”) on June 12, 2008, upon his confirmation by the U.S. Senate and after serving as the Acting Director since November 2007. The NCTC, under Mr. Leiter’s leadership, served as the primary organization in the U.S. government for integrating and analyzing all intelligence pertaining to terrorism possessed or acquired by the U.S. government, and further serves as the central and shared knowledge bank on terrorism information. Moreover, Mr. Leiter and the NCTC were responsible for the Interagency Intelligence Committee on Terrorism list which identifies those persons and entities, such as the Al Haramain Islamic Foundation, that have demonstrated sustained and active support for terrorist organizations willing to attack U.S. persons or interests. Accordingly, Mr. Leiter has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mr. Leiter has knowledge and information regarding the terror sponsorship activities of Perouz Sedghaty and Soliman al Buthe.

26. Mark Rossini

Address: Upon information and belief, the individual resides in the United States.

Subject: Mr. Rossini is a former FBI Special Agent who served as the FBI’s liaison to the Central Intelligence Agency’s Bin Laden Issue Station. Mr. Rossini has knowledge and information regarding the United States government’s investigations of al Haramain providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

27. Abdul al Salam al Hilal

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Al Hilal, who has been linked to members of al Qaida, Egyptian Islamic Jihad, and the Islamic Army of Aden, has stated to U.S. authorities that he has been involved in aiding al Qaeda and other extremists since 1996. According to the Department of Defense, al Hilal met with the director of the al Haramain office in July 1999 where they discussed a plan to attack the British and American embassies. Al Hilal has knowledge and information regarding: (i) the operations, policies, and activities of al Haramain; and (ii) the allegations, investigations, and facts concerning al Haramain’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

E. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of Wa'el Hamza Jelaidan and the Rabita Trust. Individuals include, but are not limited to:

1. **Wa'el Hamza Jelaidan**
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.
Subject: Jelaidan, an Executive Order 13224 designee, served as Rabita Trust's Director General, and was further appointed to Rabita's Board of Trustees. Accordingly, Jelaidan has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
2. **Dr. Abdullah bin Abdul Mohsen al Turki**
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.
Subject: In 1993, Dr. al Turki was appointed as the Saudi Minister of Islamic Affairs by King Fahd. In that role, Dr. al Turki held authority for setting the policies for the Saudi charities, as well as directing and supervising their activities and operations. Those charities under Dr. al Turki's authority included the MWL, IIRO, Al Haramain Islamic Foundation, World Assembly of Muslim Youth, and Rabita Trust. Accordingly, Dr. al Turki has knowledge and information regarding the allegations, investigations, and facts concerning those entities' provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations, particularly as they relate to Rabita Trust. Moreover, Dr. al Turki has knowledge and information regarding Rabita Trust's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).
3. **Dr. Abdullah bin Saleh al Obaid**
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.
Subject: Dr. al Obaid served as a member of Rabita Trust's Board of Trustees. Accordingly, Dr. al Obaid has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. al Obaid has knowledge and information regarding Rabita Trust's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).
4. **Dr. Adnan Khalil Basha**
Address: Upon information and belief, the individual resides in the Kingdom of

Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Dr. Basha served as a member of Rabita Trust's Board of Trustees. Accordingly, Dr. Basha has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. Basha has knowledge and information regarding Rabita Trust's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

5. Dr. Abdullah Omar Naseef

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Dr. Naseef served as Secretary General of the MWL from approximately 1983-1993, the parent organization of the IIRO. Accordingly, Dr. Naseef has knowledge and information regarding the IIRO's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

6. Prince Turki bin Jalawi al Saud

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Prince Turki served as official of the Saudi Joint Relief Committee ("SJRC"). Wa'el Hamza Jelaidan served as a Director of the SJRC and used the organization as a front to move money and men to and from the Balkans on behalf of Osama bin Laden. Accordingly, Prince Turki has knowledge and information regarding the SJRC's relationship with, and employment of, Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

7. Prince Talal bin Abdulaziz al Saud

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Prince Talal served as a member of the Board of Directors of Rabita Trust, a subsidiary of the MWL. Accordingly, Prince Talal has knowledge and information regarding Rabita Trust's operations, policies, and activities, including the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Prince Talal has knowledge and information regarding the SJRC's relationship with, and employment of, Wa'el Hamza Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

8. Representatives of the Kingdom of Saudi Arabia's Supreme Council of Islamic Affairs and Ministry of Islamic Affairs Who Served Between 1992 and 2002.

Address: Upon information and belief, those individuals reside in the Kingdom of Saudi Arabia.

Subject: The Supreme Council of Islamic Affairs and the Ministry of Islamic Affairs have information and knowledge regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Abdul Rahman al Swailem

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Swailem served as the Chairman of the Saudi Joint Relief Committee ("SJRC") and was responsible for appointing Wa'el Hamza Jelaidan as a Director of the SJRC. Jelaidan used the SJRC as a front to move money and men to and from the Balkans on behalf of Osama bin Laden. Accordingly, Mr. Swailem has knowledge and information regarding the SJRC's relationship with, and employment of, Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

10. Dr. Saleh al Wohaibi

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at the Law Firm of Omar T. Mohammedi, LLC, Woolworth Building, 233 Broadway, Suite 801, New York, NY 10279.

Subject: Dr. Wohaibi currently serves as the Secretary General for the World Assembly of Muslim Youth ("WAMY"). Dr. Wohaibi further served as an official of the Saudi Joint Relief Committee ("SJRC"). Wa'el Hamza Jelaidan served as a Director of the SJRC and used the organization as a front to move money and men to and from the Balkans on behalf of Osama bin Laden. Accordingly, Dr. Wohaibi has knowledge and information regarding the SJRC's relationship with, and employment of, Jelaidan (co-founder of al Qaeda and close associate to Osama bin Laden).

11. Yassin Kadi

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Kadi was designated as a Specially Designated Global Terrorist ("SDGT") by the U.S. Treasury Department on October 12, 2001. According to the U.S. government, Kadi "has funded terrorist and extremist individuals and operations." Kadi had an extensive personal, commercial, and charitable relationship with Kadi spanning several decades. Accordingly, Kadi has knowledge and information regarding the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

12. Chafiq Ayadi

Address: Unknown.

Subject: Mr. Ayadi worked with Jelaidan on several corporate entities. Ayadi was designated as a Specially Designated Global Terrorist ("SDGT") by the U.S.

Treasury Department on October 12, 2001. Accordingly, Ayadi has knowledge and information regarding the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

13. Mamdouh Mahmud Salim

Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.

Subject: Salim a founding member of al Qaeda responsible for managing terrorist training camps in Afghanistan and Pakistan and undertaking efforts to obtain nuclear weapons for al Qaeda. Salim was arrested by German authorities on September 16, 1998 for his role in the 1998 Embassy bombings. Salim handled much of al Qaeda's international business activities, including corporate activities with Jelaidan. Accordingly, Salim has knowledge and information regarding the allegations, investigations, and facts concerning Jelaidan's provision of financial and material support to Osama bin Laden and his al Qaeda associates.

14. Stuart A. Levey

Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.

Subject: Mr. Levey was the U.S. Department of the Treasury's Under Secretary for Terrorism and Financial Intelligence from July 2004 through March 2011. In his capacity as Under Secretary for Terrorism and Financial Intelligence, Mr. Levey has knowledge and information regarding the United States government's investigations of Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levey further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaeda leadership and for providing logistical and financial support to al Qaeda." Moreover, Mr. Levey has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida."

15. Robert Werner

Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.

Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury's Assistant General Counsel for Enforcement and Intelligence and further served as Treasury's Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC's Director, Mr. Werner oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has

knowledge and information regarding the United States government's investigations of Jelaidan and Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

16. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Ms. Hammerle further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida." Moreover, Ms. Hammerle has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida."

17. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Levitt further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida." Moreover, Mr. Levitt has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida."

18. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 1987 to 2004. In his capacity as OFAC's Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information

regarding the United States government's investigations of Rabita Trust for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Newcomb further has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida." Moreover, Mr. Newcomb has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida."

19. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Center for Strategic and International Studies, 1616 Rhode Island Avenue, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of Rabita Trust for "its close ties to senior al Qaida leadership and for providing logistical and financial support to al Qaida." Moreover, Mr. Zarate has knowledge and information regarding the U.S. Department of the Treasury's Executive Order 13224 designation of Jelaidan for "direct[ing] organizations that have provided financial and logistical support to al-Qa'ida."

20. George J. Tenet

Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps. Moreover, Mr. Tenet has knowledge and information regarding Jelaidan's pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

21. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) Osama bin Laden's fatwas and other statements encouraging Muslims to engage in jihad against the United States and other Western countries; (iii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iv) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation, and others; (v) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (vi) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vii) the charities' sponsorship and funding of al Qaeda and militant training camps. Moreover, Mr. Scheuer has knowledge and information regarding Jelaidan's pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

22. Patrick J. Fitzgerald

Address: Upon information and belief, the individual resides in the United States and can be contacted through Skadden Arps, 155 N. Wacker Drive, Chicago, Illinois 60606.

Subject: Fitzgerald served as the United States Attorney for the Northern District of Illinois and a member of the U.S. Department of Justice Office of Special Counsel. Since the early 1990's, Fitzgerald has handled several high profile terrorism cases, including: (1) serving as the prosecutor in the 1993 World Trade Center bombing case; (2) serving as chief counsel in prosecutions relating to the 1998 U.S. Embassy Bombings in Kenya and Tanzania; and (3) serving as chief counsel in the prosecution of terrorism financier Enaam Arnaout. Fitzpatrick has interviewed several former members of al Qaeda in relation to those prosecutions, including FBI cooperating witness Jamal al Fadl. In those capacities, Fitzgerald has knowledge and information regarding the following: (i) the origins of al Qaeda; (ii) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda; (iii) the participation of the ostensible charities that operated within that infrastructure, including the Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, al Haramain Islamic Foundation, Rabita Trust, Benevolence International Foundation,

and others; (iv) the use of the charities to raise, launder, and distribute funds on behalf of al Qaeda; (v) the charities' provision of weapons, visas and passports, identification cards, safe houses, other physical assets, and logistical support to al Qaeda and affiliated terrorist organizations; and (vi) the charities' sponsorship and funding of al Qaeda and militant training camps. Moreover, Mr. Fitzgerald has knowledge and information regarding Jelaidan's pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

23. John Roth

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of Homeland Security.

Subject: Mr. Roth served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Roth's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Rabita Trust. Mr. Roth has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mr. Roth has knowledge and information regarding Jelaidan's pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

24. Douglas N. Greenburg

Address: Upon information and belief, the individual resides in the United States and can be contacted through Latham & Watkins LLP, 555 Eleventh Street, N.W., Washington, D.C., 20004.

Subject: Mr. Greenburg served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Mr. Greenburg's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Rabita Trust. Mr. Greenburg has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mr. Greenburg has knowledge and information regarding Jelaidan's pervasive

sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

25. Serena B. Wille

Address: Upon information and belief, the individual resides in the United States.

Subject: Ms. Wille served as a staff member to the National Commission on Terrorist Attacks Upon the United States ("9/11 Commission"), and in that capacity extensively reviewed and analyzed a variety of intelligence reporting and other documentation from the United States government and its agencies (including but not limited to the Department of State, Department of the Treasury, and the Federal Bureau of Investigation), as well as foreign intelligence sources, relating to those persons and entities that provided financial and material support to Osama bin Laden and al Qaeda in the years leading up to the September 11, 2001 attacks. Ms. Wille's analysis and investigation encompassed facts and evidence relating to the terror sponsorship activities of charitable organizations such as the Rabita Trust. Ms. Wille has knowledge and information regarding: (i) the operations, policies, and activities of Rabita Trust; and (ii) the allegations, investigations, and facts concerning Rabita Trust's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Ms. Wille has knowledge and information regarding Jelaidan's pervasive sponsorship of Osama bin Laden and al Qaeda via the charitable organizations under his control.

F. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of Sanabel al Kheer, Inc. and Sana Bell, Inc. Individuals include, but are not limited to:

1. M. Yaqub Mirza

Address: Upon information and belief, the individual resides in the United States and can be contacted through the attorneys at Luque Marino, 910 17th Street, N.W., Suite 800, Washington, D.C. 20006, and Law Office of Steven Barentzen, 1575 Eye Street, N.W., Suite 300, Washington, D.C. 20005.

Subject: Mirza was an original member of Sana-Bell, Inc.'s Board of Trustees when it was incorporated in Washington, D.C. on July 28, 1989. Initial board members also included Ibrahim Afandi and Saleh Kamel, who have been identified as al Qaeda's top financial sponsors. Mirza remained a board member until Sana-Bell ceased to exist in or around 2002. Accordingly, Mirza has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Mirza was an original member of the Sanabel al Kheer, Inc.'s Board of Directors when it was incorporated in the Commonwealth of Virginia on August 14, 2000. Mirza also served as Sanabel's Secretary and Registered Agent, and remained a board member until sometime between July 2004 and April 1, 2005. Accordingly, Mirza has knowledge and information regarding: (i) the operations, policies, and activities of Sanabel al Kheer; and (ii) the allegations, investigations, and facts concerning Sanabel al Kheer's provision of

financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

2. Dr. Saleh H. Saqri

Address: Upon information and belief, the individual resides in the United States.

Subject: Saqri is a former member of Sana-Bell, Inc.'s Board of Trustees.

Accordingly, Saqri has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

3. Dr. Abdullah bin Saleh al Obaid

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Dr. Obaid is a former member of Sana-Bell, Inc.'s Board of Trustees.

Accordingly, Dr. Obaid has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Moreover, Dr. Obaid was an original member of the Sanabel al Kheer, Inc.'s Board of Directors when it was incorporated in the Commonwealth of Virginia on August 14, 2000. Dr. Obaid also served as Sanabel's President. Accordingly, Dr. Obaid has knowledge and information regarding: (i) the operations, policies, and activities of Sanabel al Kheer; and (ii) the allegations, investigations, and facts concerning Sanabel al Kheer's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

4. Dr. Adnan Khalil Basha

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Bernabei & Wachtel, PLLC, 1775 T Street, N.W., Washington, D.C. 20009.

Subject: Dr. Basha served as Secretary General to the International Islamic Relief Organization ("IIRO") and also served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Dr. Basha has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc. Moreover, Dr. Basha is a former member of Sana-Bell, Inc.'s Board of Trustees. Accordingly, Dr. Basha has knowledge and information regarding: (i) the operations, policies, and

activities of Sana-Bell; and (ii) Sana-Bell's dissolution and subsequent disposition of corporate records.

5. Abdullah A. al Noshan

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Noshan is a former member of Sana-Bell, Inc.'s Board of Trustees.

Accordingly, Noshan has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Dr. Abdulrahman al Saati

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the Islamic Economics Research Center, King Abdulaziz University, Jeddah, Saudi Arabia.

Subject: Al Saati is an original member of Sana-Bell, Inc.'s Board of Trustees.

Accordingly, al Saati has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

7. Dr. Farid Yasin Qurashi

Address: Upon information and belief, the individual can be contacted through the International Islamic Relief Organization in the Kingdom of Saudi Arabia, and/or through the IIRO's attorneys at Lewis Baach PLLC, 1899 Pennsylvania Ave., N.W., Washington, D.C. 20006.

Subject: Qurashi is an original member of Sana-Bell, Inc.'s Board of Trustees.

Accordingly, Qurashi has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. Sulaiman al Rajhi

Address: Upon information and belief, the individual can be contacted through the Al Rajhi Banking and Investment Corporation, Riyadh, Saudi Arabia or through the attorneys at Fish & Richardson, 717 Main Street, Suite 5000, Dallas, Texas 75201.

Subject: Al Rajhi is an original member of Sana-Bell, Inc.'s Board of Trustees.

Accordingly, al Rajhi has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Ibrahim Afandi

Address: Upon information and belief, the individual can be contacted through the Sheikh Ibrahim Afandi Group, Jeddah, Saudi Arabia.

Subject: Afandi is an original member of Sana-Bell, Inc.'s Board of Trustees and has been identified as one of al Qaeda's top financial sponsors. Accordingly, Afandi has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Saleh Kamel

Address: Upon information and belief, the individual can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Kamel is an original member of Sana-Bell, Inc.'s Board of Trustees and has been identified as one of al Qaeda's top financial sponsors. Accordingly, Afandi has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; and (ii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

11. Sulaiman al Ali

Address: Unknown.

Subject: Mr. Ali is a former member of Sana-Bell, Inc.'s Investment Committee and managed the International Islamic Relief Organization's investments in the United States. Accordingly, Mr. Ali has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

12. Samir al Radhi

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.

Subject: Mr. Radhi is a former employee of the International Islamic Relief Organization and Sanabel al Khair-Saudi Arabia and managed their investments in the United States and elsewhere. Accordingly, Mr. Radhi has knowledge and information regarding: (i) the operations, policies, and activities of Sanabel al Kheer, Inc. and Sana-Bell, Inc.; (ii) Sana-Bell, Inc.'s dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

13. Dr. Ghazi Mahfouz Felemban

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Felemban is a former Assistant Secretary General for Finance of the

International Islamic Relief Organization and Sanabel al Khair-Saudi Arabia and managed their investments in the United States and elsewhere. Accordingly, Mr. Felemban has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

14. Soliman Bihieri

Address: Unknown.

Subject: Mr. Biheiri is a former investor of the Sana Bell, Inc. funds. Accordingly, Mr. Biheiri has knowledge and information regarding: (i) the operations, policies, and activities of Sana-Bell; (ii) Sana-Bell's dissolution and subsequent disposition of corporate records; and (iii) the allegations, investigations, and facts concerning Sana-Bell's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

15. Abdelmoniem M. El Hillali

Address: Upon information and belief, the individual can be contacted through the attorneys at The Manning Group, 1001 L Street, N.W., Washington, D.C. 20001.

Subject: Mr. El Hillali is the current President of Sanabel al Kheer, Inc., and has previously served as its Vice-President and Secretary. Mr. El Hillali has knowledge and information regarding the operations, policies, and activities of Sanabel al Kheer.

16. Gregory Brown

Address: Upon information and belief, the individual can be contacted through the attorneys at The Manning Group, 1001 L Street, N.W., Washington, D.C. 20001.

Subject: Mr. Brown is the current Secretary of Sanabel al Kheer, Inc. Mr. Brown has knowledge and information regarding the operations, policies, and activities of Sanabel al Kheer.

17. Hassan Nahli

Address: Upon information and belief, the individual can be contacted through the attorneys at The Manning Group, 1001 L Street, N.W., Washington, D.C. 20001.

Subject: Upon information and belief, Nahli currently holds, or has held, custody of Sanabel al Kheer, Inc.'s financial and accounting books. Nahli has knowledge and information regarding the operations, policies, and activities of Sanabel al Kheer.

18. Uthman bin Abdul Kader Hafez

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Hafex served as the Chief Executive officer of Sanabel al Khair-Saudi Arabia. Accordingly, Mr. Hafez has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations,

and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

19. Mr. Khaled bin Hamed Zini

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Zini served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Zini has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

20. Mr. Abdullah bin Salem bin Mahfuz

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Mahfuz served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Mahfuz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

21. Mr. Talal bin Muhammad Badkuk

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Badkuk served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Badkuk has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

22. Mr. Mazen bin Muhammad Batterji
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mr. Batterji served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Batterji has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
23. Dr. Abdullah bin Abd al Aziz al Muslah
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Dr. Muslah served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Dr. Muslah has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
24. Dr. Yusuf bin Abdullah Bassudan
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Dr. Bassudan served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Dr. Bassudan has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
25. Sheikh Abd al Rahman Abd al Kader Faqih
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Sheikh Faqih served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee

and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Sheikh Faquih has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

26. Ibrahim Afandi

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Afandi served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Afandi has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

27. Ibrahim bin Muhammad al Jamih

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Jamih served as a member of the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Jamih has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

28. Ahmad Muthar

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Muthar served as legal counsel to the IIRO's Board of Directors and further served on the committee established by the Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Muthar has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations,

and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

29. Sheikh Saleh al Zamal
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Sheikh Zamal served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Sheikh Zamal has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
30. Sheikh Mari bin Mafuz
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Sheikh Mafuz served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Sheikh Mahfuz has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
31. Sharif Mansur Abu Riyash
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mr. Riyash served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Riyash has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.
32. Abd al Aziz Randora
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mr. Randora served on the committee established by the IIRO Board of

Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Randora has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

32. Ali Bashawari

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Bashawari served on the committee established by the IIRO Board of Directors to oversee and evaluate the operations of Sanabel al Khair-Saudi Arabia, including its investment arms in the United States, Sanabel al Kheer, Inc. and Sana-Bell, Inc. Accordingly, Mr. Bashawari has knowledge and information regarding: (i) the operations, policies, and activities of the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.; and (ii) the allegations, investigations, and facts concerning the provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations by the IIRO, Sanabel al Khair-Saudi Arabia, Sanabel al Kheer, Inc., and Sana-Bell, Inc.

G. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of the Dubai Islamic Bank (“DIB”). Individuals include, but are not limited to:

1. Saeed Ahmed Lootah

Address: Unknown.

Subject: Mr. Lootah is a co-founder and top shareholder of Dubai Islamic Bank (“DIB”). Mr. Lootah was identified by Jamal al Fadl as one of al Qaeda’s contacts at DIB. As a result of his long-standing relationship with the bank, Mr. Lootah has knowledge and information regarding the allegations, investigations, and facts concerning DIB’s provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11th hijackers; (iii) DIB accounts that were frozen following the September 11th attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Mr. Lootah has knowledge and information regarding his own relationship with al Qaeda members such as Saidi Madani al Tayyib, and any financial services DIB provided to al Tayyib and other members and/or sympathizers of al Qaeda.

2. Dr. Hussain Hamid Hassan

Address: Unknown.

Subject: Dr. Hassan is the current Chairman of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Hassan has knowledge and information regarding the Board's supervision and control over much of DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Hassan further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11th hijackers; (iii) DIB accounts that were frozen following the September 11th attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Hassan has knowledge and information regarding his relationship with Abdullah Azzam, co-founder of al Qaeda and spiritual mentor to Osama bin Laden.

3. Dr. Ajeel Jassem Nashmi

Address: Unknown.

Subject: Dr. Nashmi is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Dr. Nashmi has knowledge and information regarding the Board's supervision and control over much of DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Dr. Nashmi further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11th hijackers; (iii) DIB accounts that were frozen following the September 11th attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Nashmi has knowledge and information regarding his own statements and/or publications advocating jihad.

4. Sheikh Mohammed Abdul Razak Alsidiq

Address: Unknown.

Subject: Sheikh Alsidiq is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Sheikh Alsidiq has knowledge and information regarding the Board's supervision and control over much of DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Sheikh Alsidiq further has knowledge and information

regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11th hijackers; (iii) DIB accounts that were frozen following the September 11th attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Nashmi has knowledge and information regarding his own statements and/or publications advocating jihad.

5. Sheikh Ali Muhssein al Din Qaradaghi

Address: Unknown.

Subject: Sheikh Qaradaghi is a former member of DIB's Fatwa and Shariah Supervisory Board. In his capacity as a member of that Board, Sheikh Qaradaghi has knowledge and information regarding the Board's supervision and control over much of DIB's operations, DIB's Shariah-compliant banking services, DIB's obligations under Shariah to support jihad, and DIB's policies relative to the distribution of zakat funds. Sheikh Qaradaghi further has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to: (i) DIB accounts used by, or for the benefit of, Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, and others to launder and transfer money used for terrorist activities, including the September 11, 2001 attacks; (ii) DIB accounts used by, or for the benefit of, the September 11th hijackers; (iii) DIB accounts that were frozen following the September 11th attacks; and (iv) requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism. Moreover, Dr. Qaradaghi has knowledge and information regarding his own statements and/or publications advocating jihad.

6. Zuhair Saed al Rabii

Address: Upon information and belief, the individual can be contacted through the Dubai Islamic Bank.

Subject: Mr. Rabii is the current head of Financial Security at DIB and formerly served as manager of the Central Activities Department which coordinated DIB's efforts to combat money laundering. In those capacities, Mr. Rabii has knowledge and information regarding DIB's anti-money laundering ("AML"), combatting terrorism financing ("CTF"), and know-your-customer ("KYC") policies and procedures. Mr. Rabii further has knowledge and information regarding training of DIB personnel in AML, CTF and KYC policies and procedures, DIB's account opening procedures, software or internet-based applications used by DIB for monitoring and detecting money-laundering, terrorist financing, or suspicious activities, DIB's policies, procedures, and compliance with suspicious transaction reporting or suspicious activity reporting, and internal and external auditing of DIB's AML, CTF, KYC policies and practices.

7. Sultan bin Nasser al Suwaidi
Address: Upon information and belief, the individual can be contacted through the International Monetary Fund in Washington, D.C.
Subject: Mr. Suwaidi served as the Governor of the Central Bank of the United Arab Emirates from 1991-2014. In that capacity, Mr. Suwaidi would have information and knowledge concerning: (1) any and all directives issued by the Central Bank to DIB regarding the investigation of banking and financial accounts linked to terrorism, including the freezing of any such accounts; (2) all accounts at DIB that were ordered frozen following the September 1, 2001 attacks; (3) DIB's response to any such inquiries, directives or orders from the Central Bank; and (4) any and all meetings between the United States government and the representatives of the U.A.E. government or the Central Bank regarding banking and financial accounts linked to terrorism.
8. Mohamed Saeed Ahmed Abdulla al Sharif
Address: Upon information and belief, the individual can be contacted through the Dubai Islamic Bank.
Subject: Mr. Sharif currently serves as the Chairman of DIB's Board of Directors. Mr. Sharif would have information and knowledge concerning: (1) any and all directives issued by the Central Bank to DIB regarding the investigation of banking and financial accounts linked to terrorism, including the freezing of any such accounts; (2) all accounts at DIB that were ordered frozen following the September 1, 2001 attacks; (3) DIB's response to any such inquiries, directives or orders from the Central Bank; and (4) any and all meetings between the United States government and the representatives of the U.A.E. government or the Central Bank regarding banking and financial accounts linked to terrorism.
9. Butti Khalifa bin Darwish al Falasi
Address: Upon information and belief, the individual can be contacted through the Dubai Islamic Bank.
Subject: Mr. Falasi served as DIB's Chief Executive Officer. In that capacity, Mr. Falasi would have information and knowledge concerning: (1) any and all directives issued by the Central Bank to DIB regarding the investigation of banking and financial accounts linked to terrorism, including the freezing of any such accounts; (2) all accounts at DIB that were ordered frozen following the September 1, 2001 attacks; (3) DIB's response to any such inquiries, directives or orders from the Central Bank; (4) any and all meetings between the United States government and the representatives of the U.A.E. government or the Central Bank regarding banking and financial accounts linked to terrorism; and (5) any investigation conducted relative to Ali Abdul Aziz Ali, including inquiries from the U.S. government regarding accounts linked to Ali Abdul Aziz Ali.
10. As Yet Unidentified Participants in the July 1999 Meeting(s) in the United Arab Emirates Involving U.S. Officials and Representatives of the Government of the United Arab Emirates.
Address: Unknown.
Subject: As yet unidentified individuals from the U.S. government, U.A.E.

government, Central Bank of the U.A.E., and/or DIB having information and knowledge concerning the meeting(s) held in or around July 1999 in the U.A.E. involving U.S. officials and representatives of the U.A.E. government, relative to claims that Osama bin Laden and al Qaeda was allowed to “funnel money through the Dubai Islamic Bank” with the approval of DIB officials.

11. As Yet Unidentified Participants in the 1998 Meeting(s) Involving U.S. Officials and Representatives of the Government of the United Arab Emirates.
Address: Unknown.
Subject: As yet unidentified individuals from the U.S. government, U.A.E. government, Central Bank of the U.A.E., and/or DIB having information and knowledge concerning the meeting(s) held in or around 1998 involving U.S. officials and representatives of the U.A.E. government, relative to claims that certain accounts at DIB were used to facilitate the movement of money intended for the 1998 U.S. Embassy bombings in Kenya and Tanzania.

12. As Yet Unidentified Individuals Responsible for Opening Accounts for Osama Bin Laden and Other Members of Al Qaeda.
Address: Upon information and belief, the individuals can be contacted through the Dubai Islamic Bank.
Subject: As yet unidentified DIB personnel responsible for opening and servicing accounts at DIB for Osama bin Laden, Mustafa Ahmed al Hawsawi, Ali Abdul Aziz Ali, Said Madani al Tayyib, Mamdouh Mahmud Salim, and other members of al Qaeda, have information and knowledge regarding DIB’s account opening procedures; anti-money laundering (“AML”), combatting terrorism financing (“CTF”), and know-your-customer (“KYC”) procedures and other due diligence efforts that were undertaken when opening those accounts; any examination or auditing of those accounts that were conducted; and any investigation of those accounts that were conducted by DIB as a result of suspicious activities.

13. Ambassador James Foley
Address: Upon information and belief, the individual can be contacted through the U.S. Department of State.
Subject: Ambassador Foley has a long history with the U.S. Department of State, including serving as State Department Deputy Spokesman and Principal Deputy Assistant Secretary for Public Affairs from 1997-2000. In that capacity, Ambassador Foley has information and knowledge regarding the allegations, investigations, and facts concerning DIB’s provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to, requests by the United States government to DIB and/or the United Arab Emirates to end the financial relationship between Osama bin Laden and DIB, and to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism.

14. George J. Tenet
Address: Upon information and belief, the individual resides in the United States and can be contacted through Allen & Company LLC, 711 Fifth Avenue, New York, New York.

Subject: Mr. Tenet served as the Director of the Central Intelligence Agency from 1997-2004. In that capacity, Mr. Tenet has information and knowledge regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to, requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism.

15. Madeline K. Albright

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Partnership For a Secure America, 1775 K St., N.W., Suite 400, Washington, D.C. 20006.

Subject: Ms. Albright served as the U.S. Secretary of State from 1997-2001. In that capacity, Ms. Albright has information and knowledge regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden and his al Qaeda associates, including but not limited to, requests by the United States government to DIB and/or the United Arab Emirates to monitor, close, freeze, or restrict accounts at DIB due to their links to terrorism.

16. Michael F. Scheuer

Address: Upon information and belief, the individual resides in the United States and can be contacted through his office at Georgetown University, 37th and O Streets, N.W., Washington D.C. 20057.

Subject: Dr. Scheuer currently serves as an adjunct professor at Georgetown University with the Security Studies Program, but previously served as the former Chief of the Bin Laden Issue Station, the Osama bin Laden tracking unit at the Central Intelligence Agency's Counterterrorist Center from 1996 to 1999. During his 22-year career with the CIA, Dr. Scheuer also served as the Senior Advisor to the Central Intelligence Agency's Osama bin Laden Department, Chief of the Southwest/Southeast Asia Counternarcotics Operation, and Chief of the Sunni Militant Unit. In those capacities, Dr. Scheuer has knowledge and information regarding the following: (i) the vast financial and logistical infrastructure that was created to support the activities of Osama bin Laden and al Qaeda, including bin Laden's use of certain Middle Eastern banks to launder and distribute funds for terrorist activities; and (ii) the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, the Taliban, al Qaeda, and affiliated terrorist organizations.

17. Mustafa Ahmed al Hawsawi

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: In addition to managing bank accounts for, and/or for the benefit of, Osama bin Laden himself, DIB provided financial services to al Qaeda's financial officer, Mustafa Ahmed al Hawsawi. Prior to the September 11 attacks, Hawsawi used his accounts at DIB to deposit approximately \$148,895 USD into bank

accounts in Dubai that were held by two of the 9/11 hijackers, including at least one account at DIB. Additionally, in the days just prior to the attacks, the 9/11 hijackers were returning their unused funds to Hawsawi in the U.A.E. Mohamed Atta wired at least \$7,860 back to Hawsawi on September 8, 2001. On September 9th, hijacker Waleed al Shehri wired \$5,000 to Hawsawi. The day before the attack on September 10th, hijacker Marwan al Shehhi wired \$5,400 to Hawsawi. Accordingly, Hawsawi has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.

18. Ali Abdul Aziz Ali

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Khalid Sheikh Mohammed's nephew, Ali Abdul Aziz Ali (a/k/a Ammar al Baluchi), was instrumental in providing financial and travel assistance for the September 11, 2001 plot via his account(s) at DIB. According to the 9-11 Commission Final Report, Ali transferred \$5,000 to 9/11 hijackers Nawaf al Hazmi and Khalid al Mihdhar in California. Ali was similarly sending funds to the al Qaeda cell in Hamburg, Germany. The 9-11 Report states that the Hamburg operatives paid for their flight training primarily with funds wired from Dubai by KSM's nephew. Between June 29 and September 17, 2000, Ali sent Marwan al Shehhi and Mohamed Atta a total of \$114,500 in five transfers ranging from \$5,000 to \$70,000. Department of Defense Unclassified Summaries of Evidence for detainees incarcerated at Guantanamo Bay, including Ali himself, confirm that Ali opened an account at DIB. Accordingly, Ali has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.

19. Khalid Sheikh Mohammed

Address: The individual is located at the United States Naval Station Guantanamo Bay, Guantanamo Bay, Cuba and is within the subpoena power of the United States District Court for the Southern District of New York.

Subject: Khalid Sheikh Mohammed ("KSM") is a former senior member of al Qaeda and the mastermind of the September 11, 2001 attacks. In furtherance of al Qaeda's objective to attack the United States on September 11, and pursuant to KSM's instructions, Ali Abdul Aziz Ali (KSM's nephew) provided financial and travel assistance to the 9/11 hijackers via his account(s) at DIB. Accordingly, KSM has knowledge and information regarding the allegations, investigations, and facts concerning DIB's provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.

20. Said Madani al Tayyib

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Tayyib is a former senior member of al Qaeda who served as al Qaeda's

“chief financial officer” during the early 1990s at the same time Osama bin Laden was building his Islamic army in Sudan. Tayyib held at least two accounts at DIB. Jamal al Fadl, a former al Qaeda official who became a cooperating witness for the United States, provided the FBI with key details regarding Tayyib’s tenure as bin Laden’s trusted advisor. According to Fadl, Tayyib was “in charge of most of Osama bin Laden’s money, including the money located outside of Sudan.” Accordingly, Tayyib has knowledge and information regarding the allegations, investigations, and facts concerning DIB’s provision of financial and material support to Osama bin Laden and his al Qaeda associates.

21. Mamdouh Mahmud Salim

Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.

Subject: Salim a founding member of al Qaeda responsible for managing terrorist training camps in Afghanistan and Pakistan and undertaking efforts to obtain nuclear weapons for al Qaeda. Salim was arrested by German authorities on September 16, 1998 for his role in the 1998 Embassy bombings. At the time of his arrest, Salim had three separate DIB accounts. Accordingly, Salim has knowledge and information regarding the allegations, investigations, and facts concerning DIB’s provision of financial and material support to Osama bin Laden and his al Qaeda associates.

22. Ali Salah Muhammad Kahlah al Marri

Address: Upon information and belief, the individual resides in Qatar.

Subject: Marri is a former member of al Qaeda who trained at al Qaeda terrorist training camps. Before traveling to the United States prior to the 9/11 attacks as instructed by Khalid Sheikh Mohammed, Marri met with Mustafa Ahmed al Hawsawi in Dubai who gave him \$10,000 for his mission. Accordingly, Salim has knowledge and information regarding the allegations, investigations, and facts concerning DIB’s provision of financial and material support to Osama bin Laden, his al Qaeda associates, and the 9/11 hijackers.

23. Ahmed Nur Ali Jumale

Address: Upon information and belief, the individual resides in Somalia.

Subject: Jumale is an al Qaeda financier designated by the Treasury Department on November 7, 2001 for his links to Osama bin Laden. Jumale, including a number of his designated businesses that make up the Al Barakaat financial and telecommunications conglomerate, held accounts at DIB. According to the Treasury officials, Jumale used the Al Barakaat group of companies “to transmit funds, intelligence and instructions” to al Qaeda and other terrorist organizations. Accordingly, Jumale has knowledge and information regarding the allegations, investigations, and facts concerning DIB’s provision of financial and material support to Osama bin Laden and al Qaeda..

24. Yassin Kadi

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Kadi was designated as a Specially Designated Global Terrorist (“SDGT”) by the U.S. Treasury Department on October 12, 2001. According to the U.S. government, Kadi “has funded terrorist and extremist individuals and operations.” Kadi has been active in the business and charitable sectors in Saudi Arabia, Pakistan, Sudan, the Balkans, Albania, Switzerland, and other countries for several decades, and has used those entities to transfer funds to accounts at DIB. Accordingly, Kadi has knowledge and information regarding the allegations, investigations, and facts concerning DIB’s provision of financial and material support to Osama bin Laden and al Qaeda.

H. Individuals with knowledge of allegations, investigations, and facts concerning the terror sponsorship activities of Yassin Kadi. Individuals include, but are not limited to:

1. Wa’el Hamza Jelaidan
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Martin F. McMahon & Associates, 1150 Connecticut Ave., N.W., Suite 900, Washington, D.C. 20036.
Subject: Jelaidan is a founding member of al Qaeda and an Executive Order 13224 Designee. Jelaidan had an extensive personal, commercial, and charitable relationship with Kadi spanning several decades. Accordingly, Jelaidan has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
2. Salim Ahmed Bin Mahfouz
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Salim Bin Mahfouz worked for Kadi as an officer of the Muwafaq Foundation as well as the IIRO. Accordingly, Mr. bin Mahfouz has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
3. Mohamed Ahmed Bin Mahfouz
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.
Subject: Mohamed Bin Mahfouz worked for Kadi as an officer of the Muwafaq Foundation as well as other corporate entities. Accordingly, Mr. bin Mahfouz has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
4. Chafiq Ayadi
Address: Unknown.
Subject: Mr. Ayadi worked for Kadi as an officer of the Muwafaq Foundation as well as other corporate entities connected to Kadi. Ayadi was designated as a

Specially Designated Global Terrorist (“SDGT”) by the U.S. Treasury Department on October 12, 2001. Accordingly, Mr. Ayadi has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

5. Abdul Rahman Bin Mahfouz

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Bin Mahfouz served as a member of the Board of Trustees for the Muwafaq Foundation and an officer of the National Commercial Bank.

Accordingly, Mr. bin Mahfouz has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

6. Rais bin Mahfouz

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. bin Mahfouz served as a member of the Board of Trustees for the Muwafaq Foundation. Accordingly, Mr. bin Mahfouz has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

7. Talal Badkook

Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia.

Subject: Mr. Badkook served as a member of the Board of Trustees for the Muwafaq Foundation. Accordingly, Mr. Badkook has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

8. Dr. Mohamed Ali El Gari Bin Eid

Address: Unknown.

Subject: Dr. Eid served as a member of the Board of Trustees for the Muwafaq Foundation. Accordingly, Mr. Eid has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

9. Abdul Gani al Khariji

Address: Unknown.

Subject: Mr. Khariji served as a member of the Board of Trustees for the Muwafaq Foundation. Accordingly, Mr. Khariji has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial

and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

10. Amir Mehdi
Address: Unknown.
Subject: Mr. Mehdi served as the head of the Muwafaq Foundation's branch office in Pakistan. The Pakistan government raised the office on March 21, 1995, and Mehdi was arrested on May 29, 1995. Accordingly, Mr. Mehdi has knowledge and information regarding the allegations, investigations, and facts concerning Kadi's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
11. Dr. Abdul Latif Saleh
Address: Unknown.
Subject: Dr. Saleh served as the head of the Muwafaq Foundation's branch office in Albania. Dr. Saleh founded the Albanian Islamic Jihad and was deported from Albania in 1999 for his links to terrorism. Accordingly, Dr. Saleh has knowledge and information regarding the allegations, investigations, and facts concerning Kadi's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
12. Yasin Ahmed Mohamed Ali
Address: Unknown.
Subject: Mr. Ali worked for Kadi as an officer of several corporate entities owned by Kadi. Accordingly, Mr. Ali has knowledge and information regarding the allegations, investigations, and facts concerning Kadi's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
13. Waleed Mohamed Abu Sheikha
Address: Unknown.
Subject: Mr. Sheikha worked for Kadi as an officer of several corporate entities owned by Kadi as well as his International Trade Manager. Accordingly, Mr. Sheikha has knowledge and information regarding the allegations, investigations, and facts concerning Kadi's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
14. Soliman Bihieri
Address: Unknown.
Subject: Mr. Biheiri is a former investment manager of the of Kadi funds. Mr. Biheiri was investigated by U.S. authorities for terror financing and convicted of making false statements and immigration violations. Accordingly, Mr. Biheiri has knowledge and information regarding the allegations, investigations, and facts concerning Kadi's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

15. Rashid Teymour
Address: Faisal Private Bank, 3 Quai Mont Blanc, Geneva, Switzerland.
Subject: Mr. Teymour was a Deputy General Manager for Faisal Finance and managed numerous bank accounts and investments for Kadi and his corporate entities. Accordingly, Mr. Teymour has knowledge and information regarding the allegations, investigations, and facts concerning Kadi's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
16. Prince Mohamed al Faisal al Saud
Address: Upon information and belief, the individual resides in the Kingdom of Saudi Arabia and can be contacted through the attorneys at Wilmer Cutler Pickering Hale, 1875 Pennsylvania Avenue, Washington D.C.
Subject: Prince Mohamed had business and financial relationships with Kadi in Saudi Arabia, Bahrain, Sudan, Pakistan, Albania, and Switzerland. Accordingly, Prince Mohamed has knowledge and information regarding the allegations, investigations, and facts concerning Kadi's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
17. Hasna Cuneyt Zapsu
Address: Balsu Gida, Buyukdere Cad. #237, Noramin Is Mrk. Kat 1/A113, Maslak, Istanbul, Turkey.
Subject: Mr. Zapsu has had an extensive social, business and financial relationship with Kadi. Accordingly, Mr. Zapsu has knowledge and information regarding the allegations, investigations, and facts concerning Kadi's provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.
18. Mamdouh Mahmud Salim
Address: Upon information and belief, the individual is incarcerated at the Administrative Maximum Facility (ADX) in Florence, Colorado.
Subject: Salim a founding member of al Qaeda responsible for managing terrorist training camps in Afghanistan and Pakistan and undertaking efforts to obtain nuclear weapons for al Qaeda. Salim was arrested by German authorities on September 16, 1998 for his role in the 1998 Embassy bombings. Salim handled much of al Qaeda's international business activities, including corporate activities with Kadi. Accordingly, Salim has knowledge and information regarding the allegations, investigations, and facts concerning Kadi's provision of financial and material support to Osama bin Laden and his al Qaeda associates.
19. Claude Nicati
Address: Upon information and belief, the individual resides in Switzerland.
Subject: Mr. Nicati served as the former Deputy Attorney General of Switzerland. In that capacity, Mr. Nicati was responsible for investigating Kadi's and the Muwafaq Foundation's links to terrorism and concluded that "Mr. Kadi has a long history of financing and facilitating the activities of terrorists and terrorist-related organizations, often acting through seemingly legitimate charitable enterprises and

businesses.” Accordingly, Mr. Nicati has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

20. Jean-Paul Rouiller

Address: Upon information and belief, the individual resides in Switzerland.

Subject: Mr. Rouiller served with the Swiss Federal Criminal Police. In that capacity, Mr. Rouiller was responsible for investigating Kadi’s and the Muwafaq Foundation’s links to terrorism. Accordingly, Mr. Rouiller has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

21. David D. Aufhauser

Address: Upon information and belief, the individual resides in the United States and can be contacted through Williams & Connolly LLP, 725 Twelfth Street, N.W., Washington, D.C. 20005.

Subject: Mr. Aufhauser served as General Counsel to the U.S. Department of the Treasury from 2001-2004. Accordingly, Mr. Aufhauser has knowledge and information regarding the allegations, investigations, and facts concerning Kadi’s provision of financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

22. R. Richard Newcomb

Address: Upon information and belief, the individual resides in the United States and can be contacted through DLA Piper, 500 Eighth Street, N.W., Washington, D.C. 20004.

Subject: Mr. Newcomb served as the Director of the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”) from 1987 to 2004. In his capacity as OFAC’s Director, Mr. Newcomb oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Newcomb has knowledge and information regarding the United States government’s investigations of Kadi and the Muwafaq Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

23. Robert Werner

Address: Upon information and belief, the individual resides in the United States and can be contacted through HSBC North America Holdings Inc., 452 5th Avenue, New York, NY 10018.

Subject: Mr. Werner served as the Director of the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”) from 2004-2006. Prior to taking that position, Mr. Werner served as the Treasury’s Assistant General Counsel for Enforcement and Intelligence and further served as Treasury’s Counselor to the Office of the General Counsel and the Chief of Staff at the Financial Crimes Enforcement Network (FinCEN). In his capacity as OFAC’s Director, Mr. Werner

oversaw the administration and enforcement of economic sanctions programs in furtherance of U.S. foreign policy and national security goals. Mr. Werner has knowledge and information regarding the United States government's investigations of Kadi and the Muwafaq Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

24. Barbara C. Hammerle

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Ms. Hammerle served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"). Prior to taking that position in February 2006, Ms. Hammerle served as Chief Counsel for OFAC. In her capacity as Director of OFAC, Ms. Hammerle has knowledge and information regarding the United States government's investigations of Kadi and the Muwafaq Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

25. Adam J. Szubin

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Department of the Treasury.

Subject: Mr. Szubin served as the Director of the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") from 2006-2015. Prior to taking that position in August 2006, Mr. Szubin served as the Senior Advisor to the Under Secretary for Terrorism and Financial Intelligence. In this capacity, he helped to develop and coordinate the implementation of policies on a range of issues, including terrorist financing, money laundering, sanctions programs, rogue regimes, WMD proliferation, and intelligence analysis. In his capacity as Director of OFAC, Mr. Szubin has knowledge and information regarding the United States government's investigations of Kadi and the Muwafaq Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations. Mr. Szubin became Treasury's Under Secretary for Terrorism and Financial Intelligence in 2015.

26. Matthew A. Levitt

Address: Upon information and belief, the individual resides in the United States and can be contacted through the Washington Institute for Near East Policy, 1111 19th Street, N.W., Suite 500, Washington D.C. 20036.

Subject: Mr. Levitt served as the U.S. Department of the Treasury's Deputy Assistant Secretary in the Office of Intelligence and Analysis. In his capacity as Deputy Assistant Secretary, Mr. Levitt has knowledge and information regarding the United States government's investigations of Kadi and the Muwafaq Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

27. Juan Carlos Zarate

Address: Upon information and belief, the individual resides in the United States

and can be contacted through the Center for Strategic and International Studies, 1616 Rhode Island Avenue, N.W., Washington, D.C. 20006.

Subject: Mr. Zarate served at the U.S. Department of the Treasury from 2001 to 2005, and was the first Assistant Secretary of the Treasury for terrorist financing and financial crimes. In that position, Mr. Zarate led the Treasury Department's domestic and international efforts to attack terrorist financing, build comprehensive anti-money-laundering systems, and expand the use of the department's powers to advance national security interests. Accordingly, Mr. Zarate has knowledge and information regarding the United States government's investigations of Kadi and the Muwafaq Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

28. Chris Ensley

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of State.

Subject: Mr. Ensley was the Regional Desk Officer for Middle Eastern Affairs in the State Department's Office of Counter Terrorism. Accordingly, Mr. Ensley has knowledge and information regarding the United States government's investigations of Kadi and the Muwafaq Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

29. Steve Kashkett

Address: Upon information and belief, the individual resides in the United States and can be contacted through the U.S. Department of State.

Subject: Mr. Kashkett was the Regional Desk Officer for Middle Eastern Affairs in the State Department's Office of Counter Terrorism. Accordingly, Mr. Kashkett has knowledge and information regarding the United States government's investigations of Kadi and the Muwafaq Foundation for providing financial and material support to Osama bin Laden, al Qaeda, and affiliated terrorist organizations.

Dated: September 30, 2015

Respectfully submitted,

/s/

THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' Second Set of Supplemental Initial Disclosures was filed electronically this 30th day of September 2015. Notice of this filing will be sent to all parties in 03 MDL 1570 by operation of the Southern District of New York's Electronic Case Filing ("ECF") system. Parties may access this filing through the Court's ECF system.

/s/ J. Scott Tarbutton
J. Scott Tarbutton, Esq.